

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Judge Thomas J. Tucker

**CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING
CITY OF DETROIT’S MOTION TO ENFORCE ORDER, PURSUANT TO
SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES
FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND
MANNER OF NOTICE THEREOF AGAINST
BETTY LETRICIA HAMBLIN**

On July 12, 2016, the City Of Detroit (“City”) filed its Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof Against Betty Letricia Hamblin (“Motion”) [Doc. No. 11356]. The Motion was served via first class mail and email upon counsel for Betty Letricia Hamblin on the same date. *See Certificate of Service* Exhibit A.

No response or objection to the Motion was filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion. *See Proposed Order* Exhibit B.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

By: /s/ Marc N. Swanson
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- and -

CITY OF DETROIT LAW DEPARTMENT

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Attorneys for the City of Detroit

DATED: August 2, 2016

Exhibit A

EXHIBIT 4 – CERTIFICATE OF SERVICE

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 12, 2016, he served a copy of the foregoing ***CITY OF DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST BETTY LETRICIA HAMBLIN*** upon counsel for Betty Letricia Hamblin, in the manner described below:

Via first class mail and email:

L. Louie Andreopoulos
Andreopoulos & Hill PLLC
28900 Woodward Ave
Royal Oak, MI 48067-0942
andhilllaw@sbcglobal.net

DATED: July 12, 2016

By: /s/ Marc N. Swanson

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Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT'S MOTION TO
ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF
THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND
3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM
AND APPROVING FORM AND MANNER OF NOTICE THEREOF
AGAINST BETTY LETRICIA HAMBLIN**

This matter, having come before the Court on the Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof Against Betty Letricia Hamblin (“Motion”)¹, upon proper notice and no response having been timely filed, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

THE COURT ORDERS THAT:

1. The Motion is granted.
2. Within five days of the entry of this Order Betty Letricia Hamblin will dismiss, or cause to be dismissed, the City of Detroit with prejudice from the case

¹ Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

captioned as *Betty Letricia Hamblin, Plaintiff, vs. The City of Detroit, Defendant*, filed in the Wayne County Circuit Court and assigned Case No. 15-008084-NF.

3. Betty Letricia Hamblin is permanently barred, estopped and enjoined from asserting the claim arising from or related to her state court action identified in paragraph 2 above against the City of Detroit or property of the City of Detroit.

4. Betty Letricia Hamblin is prohibited from sharing in any distribution in this bankruptcy case.

5. The Court retains over any and all matters arising from the interpretation or implementation of this Order.